Before the FEDERAL COMMUINCATIONS COMMISSION

DA 25-219 Released: March 12, 2025
RE: DELETE, DELETE, DELETE
GN Docket No. 25-133

Comments Due: Friday, April 11, 2025

SUMMARY:

With this filing, Turbo Technical Services ("TTS") makes comment in the above noted proceeding, requesting Commission consideration of deletion or modification of specific Rules and Regulations as outlined in the Public Notice. TTS has been involved in FCC application and licensing process since 1981 and has filed thousands of applications for hundreds of clients for AM, FM and FM translator stations and modifications. Their extensive experience with FCC processes gives them a unique and real-world view of the impact of Commission Rules and Regulations.

COMMENT:

TTS requests review and deletion of language in 73.207(b) with reference to protection to "the fifty-third (10.6 MHz above and below), and the fifty-fourth (10.8 MHz above and below)" and language in 74.1204 (g) with respect to FM translator and booster stations. Both of these sections refer to the "I.F. Separation Rule" which protects FM stations located 10.6 and 10.8 Mhz away from other FM signals.

This antiquated technical regulation is a hold-over from the last century when FM receivers utilized a local oscillator and tuning circuit which operated on 10.7 Mhz. Since the 1980's that technology has been replaced by Phase-Locked-Loop direct FM tuning circuits, making any protection to a local oscillator in an FM receiver obsolete. Twentieth century technology made this rule moot, and in the 21st century it the technical regulations are a millstone around the neck of FM broadcasters; forcing protection to non-existent FM receivers and curtailing modification and limiting site selection options for all FM services.

While there was certainly a time when this regulation was necessary, that time is long gone because of technical advances in FM receiver design and manufacture. The site restrictions caused by these rules force licensees to operate at less than optimal locations, offer restricted coverage area and service to their communities and often operate at less than allowed effective radiated power. These restrictions can also limit the viability of an FM signal as well as its marketplace value, often as a deterrent to ownership because of the restricted service area. A thorough review of these technical restrictions is hereby encouraged.

Respectfully Submitted

Jim Turvaville, Owner
Turbo Technical Services